

FILED

LUIS RENE VELASCO
450 W CRAWFORD ST #1
NOGALES, AZ 85621

10 APR - 8 AM 11:53

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF ARIZONA

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U.S. BANKRUPTCY
DISTRICT OF ARIZONA

In re:)	
Luis Rene Velasco)	Chapter 13 Proceeding 4:09-bk-23695-JMM
Debtor)	
JPMORGAN CHASE BANK, N.A., successor by merger to Bank One N.A.)	RESPONSE TO MOVANT'S MOTION TO LIFT THE AUTOMATIC STAY
Movant)	
vs)	Real Property located at: 850 W Saddle Drive Nogales AZ 85621
Luis Rene Velasco, Debtor; and)	
Dianne C. Kerns, Trustee)	
Respondents)	

Comes now debtor and for his response to Movant's Motion to lift the Automatic Stay, and enters the following:

1. Answering paragraphs 1 through 4, debtor admits the allegations therein.
2. Answering paragraph 5, debtor admits default but regarding the balance of paragraph 5, debtor is without sufficient information to admit or deny and therefore denies same.
3. Answering paragraph 6, debtor is without sufficient information to admit or deny and therefore denies same.
4. Answering paragraph 7, sentences 1 and 2, debtor admits the

allegations therein. Regarding the balance of paragraph 7, debtor is without sufficient information to admit or deny and therefore denies same.

5. Answering paragraph 8, debtors deny the allegations therein.

WHEREFORE, having fully answered the motion, Debtor prays that same be denied, that he has his costs incurred herein, that he has his attorney's fees as and when incurred, and that he has such other and further relief as may be deemed just and proper in the premises.

Dated this 7 day of April 2010.



Luis Rene Velasco

A copy of the foregoing mailed this date to:

DIANNE C. KERNS, Trustee
7320 N. LA CHOLLA #154 PMB 413
TUCSON, AZ 85741-2305

Mark S. Bosco
Leonard J. McDonald
TIFFANY & BOSCO
2525 E Camelback Rd, Ste 300
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BY: CJ